



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF AIR QUALITY



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Michael O. Leavitt
Governor

Dianne R. Nielson, Ph.D.
Executive Director

Russell A. Roberts
Director

150 North 1950 West
P.O. Box 144820
Salt Lake City, Utah 84114-4820
(801) 536-4000 Voice
(801) 536-4099 Fax
(801) 536-4414 T.D.D.

Certified Mail

DAQC-447-96

April 12, 1996

Craig N. Thatcher
Thatcher Chemical Company
P.O. Box 27407
1905 Fortune Road
Salt Lake City, Utah 84127

Dear Mr. Thatcher:

Re: **THATCHER CHEMICAL COMPANY - NOTICE OF VIOLATION AND ORDER FOR COMPLIANCE** - Conditions 10, 11, 19-C, 19-I and 20-G - Approval Order (AO) Dated September 21, 1994 - Thatcher Chemical Company - Salt Lake County

On March 7, 1996, an inspector from the Division of Air Quality (DAQ) conducted a compliance inspection of Thatcher Chemical Company's chemical manufacturing facility located at 1905 Fortune Road in Salt Lake City. As a result of the inspection it was determined that Thatcher Chemical Company was in violation of the following:

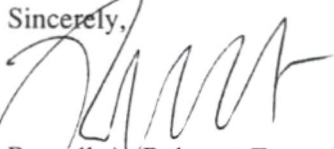
1. Conditions 10, 11, and 19-C of the AO for failing to determine the flow rate of the scrubber stacks using the required test method.
2. Conditions 9, and 19-E of the AO for failing to determine the 12-month rolling total records for production.
3. Condition 15 of the AO for failing to provide the DAQ inspector with requested records information.
4. Condition 19-I of the AO for failing to meet the Continuous Emission Monitor (CEM) requirements listed in Section 13 of the Utah Air Conservation Rules (UACR) and 40 CFR 60 Appendix B, Performance Specification 2.
5. Condition 20-G of the AO for failing to maintain the pH on the hydrochloric acid storage tank scrubber at a value of no less than ten.



The enclosed **NOTICE OF VIOLATION AND ORDER FOR COMPLIANCE** is based on the observations documented by the DAQ inspector. Please be advised that compliance with this **ORDER** is mandatory and will not relieve the company of liability for any past violations.

You will be contacted soon to arrange a meeting to discuss the violation, findings, and resolution. Questions regarding this matter may be directed to Jay Morris at (801) 536-4079.

Sincerely,



Russell A. Roberts, Executive Secretary
Utah Air Quality Board

RAR:JPM:ts

Enclosure: **NOTICE OF VIOLATION AND ORDER FOR COMPLIANCE**

cc: Department of Environmental Quality, Dianne R. Nielson
 EPA Region VIII, Lee Hanley
 Salt Lake City/County Health Department

THE UTAH AIR QUALITY BOARD

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In the Matter of	:	NOTICE OF VIOLATION
Thatcher Chemical Company	:	AND ORDER FOR
	:	COMPLIANCE
	:	No. 96030010

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This NOTICE OF VIOLATION AND ORDER FOR COMPLIANCE is issued by the UTAH AIR QUALITY BOARD (the Board) pursuant to the Utah Air Conservation Act (Act) Section 19-2-101, et seq., Utah Code Annotated 1953, as amended. The Executive Secretary is authorized to issue Notices of Violation pursuant to Section 19-2-110 of Utah Code Annotated. The Board has delegated to the Executive Secretary authority to issue ORDERS in accordance with Section 19-2-107(2)(g) of the Utah Code Annotated.

FINDINGS

1. Thatcher Chemical Company operates a chemical manufacturing facility located at 1905 Fortune Road in Salt Lake City.
2. Thatcher Chemical Company is subject to the Utah Administrative Code (UAC) R307-1-3.1 and the conditions of the September 21, 1994, Approval Order (AO).
3. An inspection was conducted on March 7, 1996, at Thatcher Chemical Company. The following information was documented during the inspection.
 - A. Conditions 10, 11, 19-C require Thatcher to determine the flow rates of the scrubber stacks on the sodium bisulfite (Condition 10), ferric chloride (condition 11), and liquid sulfur dioxide (condition 19-C), production facilities using the required test method. Thatcher Chemical has failed to determine the flow rates on these scrubber stacks.
 - B. Condition 15 of the AO which requires that all records be made available to the Executive Secretary or his representative upon request. Production records were requested from the company on February 27, 1996, March 7, 1996, March 13, 1996, and March 15, 1996. To date, no records have been submitted to the DAQ.
 - C. Conditions 9, and 19-E which requires the company to determine the rolling 12-month totals of production for sodium bisulfite, bleach and T-Chlor, calcium nitrate, ferric chloride, and liquid sulfur

dioxide. Production records were requested from the company on February 27, 1996, March 7, 1996, March 13, 1996, and March 15, 1996. To date, no records have been submitted to the DAQ.

- D. Condition 19-I requires the company to meet the Continuous Emission Monitor (CEM) requirements listed in the UAC R307-13 and 40 CFR 60, Appendix B, Performance Specification 2, which include:

- performing annual performance specification tests.
- performing quarterly cylinder gas audits.
- performing daily calibration drift tests.
- performing calibration drift test period requirements (calibration error test).

Thatcher Chemical has failed to conduct any of the above required tests.

- E. Condition 20-G which requires the pH in the hydrochloric acid storage tank scrubber to be maintained at a value of no less than ten. At the time of the inspection the pH of the scrubber was reading between 6-8.

VIOLATIONS

Based on the foregoing FINDINGS, Thatcher Chemical Company is in violation of UAC R-307-1-3.1 and the following conditions of the AO dated September 21, 1994:

1. Conditions 10, 11 and 19-C, for failing to determine the flow rate of the scrubber stacks upon start-up.
2. Conditions 9 and 19-E, for failing to maintain the production records on a rolling 12-month total.
3. Condition 15, for failing to provide production records to the Executive Secretary or his representative upon request.
4. Condition 19-I, for failing to meet the CEM testing requirements listed in the UAC R307-13 and 40 CFR 60 Appendix B, Performance Specification 2.
5. Condition 20-G, for failing to maintain the pH level in the hydrochloric acid storage tank scrubber at a value of no less than ten.

ORDER


Based on the foregoing FINDINGS AND VIOLATIONS, Thatcher Chemical Company, pursuant to Section 19-2-107(2)(g) of the Utah Code Annotated, is hereby ORDERED TO:

1. Immediately initiate all actions necessary to achieve total compliance with all applicable provisions of the Act.
2. Notify this office in writing on or before April 26, 1996, of Thatcher Chemical Company's intent to comply with this ORDER and indicate how compliance is to be achieved.

COMPLIANCE, OPPORTUNITY FOR A HEARING

This ORDER is effective immediately and shall become final unless Thatcher Chemical Company requests, in writing, a hearing within thirty (30) days pursuant to Utah Code Annotated 19-2-110. Section 19-2-115 of the Utah Code Annotated provides that violators of the Utah Air Conservation Act and/or any ORDER issued thereunder may be subject to a civil penalty of up to \$10,000.00 per day for each violation.

Dated 8th day of April, 1996.



Russell A. Roberts, Executive Secretary
Utah Air Quality Board